

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	
	§	
EDWARD CONSTANTINESCU	§	
PERRY "PJ" MATLOCK	§	
JOHN RYBARCZYK	§	CRIMINAL NO. 4:22-CR-612-S
GARY DEEL	§	
STEFAN HRVATIN	§	
TOM COOPERMAN	§	
MITCHELL HENNESSEY	§	
DANIEL KNIGHT	§	

**UNITED STATES' SUPPLEMENT TO  
NOTICE OF FORFEITURE IN SUPERSEDING INDICTMENT**

The Superseding Indictment in this case provides notice that the United States intends to seek the forfeiture of property as provided by Title 18, United States Code, Sections 981(a)(1)(C) & 982(a)(1), and Title 28, United States Code, Section 2461(c).

The United States files this supplement to notify the Defendants that the property subject to forfeiture includes, but is not limited to, the following additional property:

- a. All funds on deposit in a Bank of America account with an account number ending in 1461, held in the name of The Emerald Remainder Trust, for which Defendant Rybarczyk is the Trustee;
- b. 2020 Mercedes Benz G63 with a VIN ending in 3844, associated with Defendant Constantinescu;
- c. 2021 Lamborghini Urus with a VIN ending in 3745, associated with Defendant Constantinescu;
- d. 2018 Rolls Royce Dawn with a VIN ending in 7584, associated with Defendant Constantinescu;
- e. 2021 Lexus LC 500 with a VIN ending in 1257, associated with Defendant Matlock;
- f. 2022 Lamborghini Urus with a VIN ending in 9110, associated with Defendant Matlock;

- g. 2022 McLaren 765LT with a VIN ending in 5430, associated with Defendant Matlock;
- h. 2018 Ford F-150 Raptor with a VIN ending in 6984, associated with Defendant Rybarczyk;
- i. 2021 Lamborghini Aventador with a VIN ending in 0076, associated with Defendant Rybarczyk;
- j. 2021 Lamborghini Urus Wagon with a VIN ending in 1784, associated with Defendant Rybarczyk;
- k. 2021 Cadillac Escalade with a VIN ending in 6199, associated with Defendant Rybarczyk;
- l. 2021 Rolls Royce Ghost with a VIN ending in 7804, associated with Defendant Rybarczyk; and
- m. 2021 Ford F-150 with a VIN ending in 1582, associated with Defendant Rybarczyk.

Respectfully submitted,

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UNITED STATES ATTORNEY

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**Certificate of Service**

A true and correct copy of this pleading was served on all parties via electronic court filing on June 21, 2023.

/s/ Thomas H. Carter  
Thomas H. Carter